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February 2, 2015

U.S. Environmental Protection Agency
Leslie Patterson, Remedial Project Manager
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Special Notice Letter and Request for Information for the South
Dayton Dump and Landfill Site in Moraine, Ohio

Dear Ms. Patterson:

I am writing in preliminary response to the Special Notice Letter from Joan Tanaka to Bridgestone Americas Tire Operations, LLC (BATO), dated January 16, 2015, relating to the South Dayton Dump and Landfill Site (the Site).

The letter encouraged BATO "to contact EPA by January 30, 2015 to indicate your willingness to participate in future negotiations concerning this Site." Thomas Nash, who was contacted about the letter by another recipient, indicated that the January 30 date was not a firm deadline and that a response within "several weeks" of January 30 would be fine.

BATO has a good faith belief based on extensive investigation that it is not liable for any costs at the Site. There is a voluminous record developed in litigation relating to the Dayton Tire & Rubber Company plant which corroborates the 1980 letter from Industrial Waste Disposal Company (the waste hauler for the plant from 1956 to 1980) that *other* disposal sites—and *not* the South Dayton Dump—were used to dispose of Dayton Tire & Rubber Company wastes. That letter is attached. (BATO's predecessor acquired the assets of the Dayton Tire & Rubber Company in 1960).

Nevertheless, without any admission of liability and reserving its rights, BATO is interested in discussing with EPA a resolution of its alleged potential liability in connection with the Site. I am the person who should be contacted on behalf of BATO. My contact information is as follows:

Leslie Patterson
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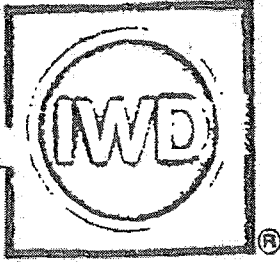
William D. Wick
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Email: bwick@ww-envlaw.com
Phone: 510-465-5750, ext. 2

Sincerely,

A handwritten signature in black ink, appearing to read "William D. Wick", with a stylized flourish extending from the end.

William D. Wick

Enclosure
cc: Thomas Nash, Esq.



INDUSTRIAL WASTE DISPOSAL CO., INC.

P. O. BOX 1453 3975 WAGONER FORD ROAD • DAYTON, OHIO 45414

PHONE 513 278-0821

May 7, 1980

Dayton Tire & Rubber
P.O. Box 96
2342 Riverside Drive
Dayton, Ohio 45407

Attn: Mr. Ralph Ball

Dear Mr. Ball:

The purpose of this letter is to trace the history of your waste disposal by listing in chronological order the sanitary landfills IWD has utilized for the disposal of your waste since 1956.

- (A) From 1956 to 1960, your waste material was dumped at the Roger Groves Landfill located on River Road, Dayton, Ohio.
- (B) For the period from 1960 to 1966, your waste was taken to both the above Groves Landfill and Sanitary Landfill Inc. (a subsidiary of IWD) located on Dorothy Lane.
- (C) From 1966 to 1971, we used North Sanitary Landfill, Inc. (a subsidiary of IWD) located on the east side of Valleycrest Drive.
- (D) From 1971 to 1976, two sites were used; North Sanitary Landfill, Inc. (a subsidiary of IWD) located on the west side of Valleycrest Drive, and Sanitary Landfill, Inc. (a subsidiary of IWD) located on Cardington Road.
- (E) From 1976 to 1979, only Sanitary Landfill, Inc. on Cardington Road was utilized.
- (F) Effective in October 1979 to the present, your waste has been dumped at North Sanitary Landfill Inc. (a subsidiary of IWD) located on Pinnacle Road.

All of the above disposal sites either were or are properly licensed by all local, state, and federal regulatory agency requirements in existence at their respective times of operations.

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INDUSTRIAL WASTE DISPOSAL CO., INC.

Dayton Tire & Rubber
Mr. Ralph Ball
May 7, 1980
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As soon as possible, IWD would like to be informed of a definite timetable for us to begin removing our waste removal equipment from your plant. In addition, we are interested in purchasing the one stationary compactor owned by DT&R which is used for corrugated recycling. We are also interested in purchasing your tire shredder.

Please do not hesitate to call with any questions or problems.

Sincerely yours,

Dennis R. Mantel

Dennis R. Mantel
Vice President of Sales

DRM;kb

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